

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

JOHN NOAKES

Plaintiff

v.

CASE WESTERN RESERVE  
UNIVERSITY,

Defendant

Case No. 1:21-cv-1776-PAB

Judge: BARKER

**PRELIMINARY ESTIMATE OF  
ATTORNEY'S FEES**

Pursuant to this Court's Notice of Case Management Conference (Doc#34), Plaintiff John Noakes respectfully submits this Preliminary Estimate of Attorney's Fees and Expenses.

This case arises, in part, under the laws of the United States, specifically Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et seq.* Costs and attorney's fees are recoverable pursuant to 28 U.S.C. § 1988.

Plaintiff estimates that fees and expenses prior to trial, including summary judgment practice, will be approximately \$150,000. Trial in this matter is likely to have fees and expenses for an additional \$75,000. This is a good faith estimate, only, based on prior Title IX litigation by Counsel, but Counsel observes that litigation is subject to factors which cannot always be foreseen;

Respectfully submitted,

/s/ Joshua Engel  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been electronically served via the Courts ECF system this February 15, 2022 upon all counsel of record.

/s/ Joshua Engel  
Joshua Engel